

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
GEORGIA ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**COALITION PLAINTIFFS' NOTICE OF FILING  
ITEMIZATION OF TIME PER PHASE**

Pursuant to this Court's June 24, 2023, direction, the Coalition Plaintiffs submit additional detail supporting their fee application (Doc. 632 (corrected initial detailed specification) and Doc. 705 (reply brief with supplemented figures)).<sup>1</sup> Specifically, Coalition Plaintiffs have itemized the hours claimed, hourly rate claimed, and resulting lodestar amount per timekeeper for each Phase of the case. Attached as Exhibit 1 is Table 4(A) which shows the requested detail for each phase described on the original Table 4, Doc. 705 at 49.

Attached as Exhibit 2 is a "Cross Check" which shows how the total number of hours and resulting lodestar claimed on the new Table 4 (A) tracks (i) with the

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<sup>1</sup> Per the Court's instruction, Coalition Plaintiffs have summarized their claimed attorney fees in this filing, but not their claimed expenses.

hours claimed on Table 4 (Hours by Phase) in Doc. 705, at 49, and (ii) with the lodestar claimed per timekeeper on Table 3 (Grand Totals) in Doc. 705, at 48.

This “Cross Check” table is a pdf of a dynamic spreadsheet page in which the cells reference and aggregate the actual entries on Table 4 (A). Since the Cross Check may be more useful to the Court in Excel format, these spreadsheets will be separately emailed to the Clerk (and opposing counsel).

The attached shows the itemization of the hours for both The Ney Firm and The Lawyers’ Committee, though neither participated in the preparation of this submission. Instead, the undersigned determined the hours-per-timekeeper based on the timesheets that The Ney Firm and The Lawyers’ Committee had already filed with Court (Doc. 632 and Doc. 705). The Lawyers’ Committee appears to have requested a lower lodestar than their itemized hours in Doc. 632 and Doc. 705 appear to support, by about 17.6 hours (and \$11,505). This reduced lodestar may be an error, or it may be the result of a deliberate exercise of billing judgment by The Lawyers’ Committee. Undersigned was unable to obtain an explanation from The Lawyers’ Committee in time to include one in this filing.

Respectfully submitted this 27<sup>th</sup> day of June, 2023.

/s/ Bruce P. Brown

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**CERTIFICATE OF COMPLIANCE AND SERVICE**

I hereby certify that (a) pursuant to LR 7.1(D), the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14, and (b) on February 4, 2023, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of the filing to all attorneys of record.

This 27<sup>th</sup> day of June, 2023.

/s/ Bruce P. Brown  
Bruce P. Brown